



State of Utah

Department of
Environmental Quality

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Executive Director

DIVISION OF AIR QUALITY
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DAQE-IN0229004-04

February 5, 2004

Mr. Jonathan M. Pachter
Consolidation Coal Company
1366 Murray-Holiday Rd
Salt Lake City, Utah 84117-5050

Dear Mr. Pachter:

Re: Intent to Approve: Modification to Replace a Crusher and Implement Fugitive Dust Control Measures, Emery County
CDS SM ATT NSPS TITLE V Minor

The attached document is the Intent to Approve (ITA) for the above-referenced project. ITAs are subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any technical questions you may have on this project to Mr. Maung Maung. He may be reached at (801) 536-4153.

Sincerely,

Rusty Ruby, Manager
New Source Review Section

RR:MM:dn

cc: Southeastern Utah District Health Department
Mike Owens, EPA Region VIII

STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

**INTENT TO APPROVE: MODIFICATION TO REPLACE A
CRUSHER AND TO IMPLEMENT FUGITIVE DUST
CONTROL MEASURES**

**Prepared By: Maung Maung, Engineer
(801) 536-4153
Email: Mmaung@utah.gov**

INTENT TO APPROVE NUMBER

DAQE-IN0229004-04

Date: February 5, 2004

Consolidation Coal Company

**Source Contact
James Byars
(412) 831-4774**

**Richard W. Sprott
Executive Secretary
Utah Air Quality Board**

Abstract

Consolidation Coal Company has proposed to replace the Cedar Rapids 500 tons per hour rated crusher with a 750 tons per hour crusher. The company also proposed to implement fugitive dust control measures that will enhance air quality in the local area.

Emery County is an attainment area of the National Ambient Air Quality Standards (NAAQS) for all pollutants.

New Source Performance Standards (NSPS) Subpart Y - Standards of Performance for Coal Preparation Plants applies to this source. Therefore, Title V of the 1990 Clean Air Act applies to this source. National Emission Standards for Hazardous Air Pollutants (NESHAP) and Maximum Available Control Technology (MACT) regulations do not apply to this source.

There will be no change in emissions due to this modification. The following potential to emit totals, tons per year, will remain the same: $PM_{10} = 2.13$, $NO_x = 1.98$, $SO_2 = 0.13$, $CO = 0.45$, $VOC = 0.04$.

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order (AO) by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-4. A notice of intent to approve will be published in the Sun Advocate on February 5, 2004. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing it will be held in accordance with UAC R307-401-4. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed AO conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the AO will be based upon the following conditions:

General Conditions:

1. This AO applies to the following company:

Site Office

Consolidation Coal Company
P.O. Box 527
Emery, Utah 84522

Phone: (435) 286-2301
Fax: (435) 286-3516

Corporate Office Location

Consol Energy Inc.
1800 Washington Road
Pittsburg, Pennsylvania 15241-1421

Phone: (412)-831-4000
Fax: (412)-831-4513

The equipment listed in this AO shall be operated at the following location:

Four miles South of Emery on Consol Road, Emery County

Universal Transverse Mercator (UTM) Coordinate System: UTM Datum NAD27
4,301.2 kilometers Northing, 478.7 kilometers Easting, Zone 12

2. All definitions, terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code (UAC) Rule 307 (R307) and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401-1.
5. All records referenced in this AO or in applicable NSPS which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request, and the records shall include the two-year period prior to the date of the request. Records shall be kept for the following minimum periods:
 - A. Emission inventories Five years from the due date of each emission statement or until the next inventory is due, whichever is longer.
 - B. All other records Two years
6. Consolidation Coal Company shall install and operate a replacement crusher and implement dust control measures, such as, upgrade water spray distribution systems, treat main traffic areas with dust suppressant as necessary, install wind fences upwind of the stockpile and a cattle guard at the entrance to the 4th east portal, etc. and shall conduct its operations of the Emery coal mine in accordance with the terms and conditions of this AO, which was written pursuant to the Notice Of Intent submitted to the Division of Air Quality (DAQ) on November 5, 2003, and additional information submitted to the DAQ on November 6, 2003.
7. This AO shall replace the AO (DAQE-AN0229002-02) dated August 5, 2002.
8. The approved installations shall consist of the following equipment or equivalent*:

Pre-1969 Equipment (grand-fathered)

 - A. 36" X 65' ROM conveyor and structure
 - B. 8' X 32' Allis-Chalmers single deck screen
 - C. 36" X 30" Pioneer apron feeder
 - D. 18" X 48" McLanahan triroll crusher
 - E. 30" X 90' product (1 1/4" X 0) conveyor

- F. 30" X 100' product (1 1/4" X 0) conveyor
- G. Two 4' X 12' Simplicity Company double deck screens
- H. 30" X 50' bin conveyor
- I. 30" X 35' truck-loading load-out belt
- J. 30" X 80' product (1 1/2" X 0) conveyor
- K. 30" X 100' product (1 1/2 X 0) conveyor
- L. Crushed Run of Mine (CROM) stockpile
- M. 220 ton capacity stoker and fine coal bins (total of four bins)
- N. 20 ton Run of Mine (ROM) bin
- O. 24" X 30' distribution conveyor

Post 1969 Equipment

- A. 42" X 10' reclaim feeder
- B. 36" X 150' reclaim conveyor and structure
- C. 1500 ton ROM surge pile

Equipment located at 4th East portal site

- A. 750 tons per hour single stage crusher* – Gundlach
- B. 5 x 10 sloping screen*
- C. Conveyors* – one with 54 inches belt and two with 42 inches belt
- D. Two reclaim feeder / loaders
- E. One diesel generator* set rated at 425 hp
- F. Truck load out

* Equivalency shall be determined by the Executive Secretary.

- 9. Consolidation Coal Company shall notify the Executive Secretary in writing when the installation of the equipment listed in condition #8 under subtitled "Equipment located at new portal" site item A. has been completed and the equipment is operational, as an initial compliance inspection is required. To insure proper credit when notifying the Executive Secretary, send your correspondence to the Executive Secretary, attn: Compliance Section.

If installation has not been completed within eighteen months from the date of this AO, the Executive Secretary shall be notified in writing on the status of the installation. At that time, the Executive Secretary shall require documentation of the continuous installation of the operation and may revoke the AO in accordance with R307-401-11.

Limitations and Tests Procedures

10. Visible emissions from any stationary point or with control facilities for the post-1969 emission points or fugitive emission source associated with the source shall not exceed the following values:

- A. All crushers - 20% opacity
- B. All screens - 20% opacity
- C. Conveyor to conveyor transfer points - 10% opacity
- D. All storage piles - 20% opacity
- E. All other points - 20% opacity

Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9.

For sources that are subject to NSPS, opacity shall be determined by conducting observations in accordance with 40 CFR 60.11(b) and 40 CFR 60, Appendix A, Method 9.

11. Visible fugitive dust emissions from haul-road traffic and mobile equipment in operational areas shall not exceed 20% opacity. Visible emissions determinations for traffic sources shall use procedures similar to Method 9. The normal requirement for observations to be made at 15-second intervals over a six-minute period, however, shall not apply. Six points, distributed along the length of the haul road or in the operational area, shall be chosen by the Executive Secretary or the Executive Secretary's representative. An opacity reading shall be made at each point when a vehicle passes the selected points. Opacity readings shall be made one-half the vehicle length or greater behind the vehicle and at approximately one-half the height of the vehicle or greater. The accumulated six readings shall be averaged for the compliance value.
12. Consolidation Coal Company shall abide by a fugitive dust control plan acceptable to the Executive Secretary for control of all dust sources associated with the Emery mine. The plan shall incorporate, at a minimum, the control measures presented as part of the NOI submitted to the Executive Secretary, dated November 5, 2003. The plan shall be submitted to the Executive Secretary, attention: Compliance Section, for approval within 30 days of the date of issuance of this AO.
13. All unpaved roads and other unpaved operational areas that are used by mobile equipment shall be water sprayed and/or chemically treated to control fugitive dust. The application of water or chemical treatment shall be used whenever dry conditions warrant and/or as determined necessary by the Executive Secretary. Treatment shall be of sufficient frequency and quantity to maintain the surface material in a damp/moist condition unless it is below freezing. The opacity shall not exceed 20% during all times the areas are in use. Records of water and/or chemical treatment shall be kept for all periods when the plant is in operation. The records shall include the following items:
 - A. Date

- B. Number of treatments made, dilution ratio, and quantity
 - C. Rainfall received, if any, and approximate amount
 - D. Time of day treatments were made
 - F. Records of temperature if the temperature is below freezing.
14. The coal storage piles shall be watered to minimize generation of fugitive dusts, as dry conditions warrant or as determined necessary by the Executive Secretary. Records of water sprays shall be kept for all periods when the plant is in operation.
15. The facility shall abide by all applicable requirements of R307-205-5 for Fugitive Emissions and Fugitive Dust sources.
16. The following production and/or consumption limits shall not be exceeded:
- A. 1,300,000 tons of coal production per rolling 12-month period
 - B. 1500 tons of coal maximum contained in the ROM coal surge pile
 - C. 300 hours of operation on the 425 hp diesel generator per rolling 12-month period

Compliance with limitations shall be determined on a rolling 12-month total. Consolidation Coal Company shall calculate a new 12-month total based on the fifth day of each month using data from the previous 12 months. Records of production shall be kept for all periods when the plant is in operation. Production shall be determined by examination of company coal sales records. The records shall be kept on a daily basis.

Fuels

17. The owner/operator shall use only #2 diesel fuel oil in all equipment.
18. The sulfur content of any fuel oil or diesel burned shall not exceed 0.5 percent by weight for diesel fuels consumed in all other equipment. The sulfur content shall be determined by ASTM Method D-4294-89 or approved equivalent. Certification of diesel oil shall be either by Emery mine's own testing or test reports from the fuel marketer.

Federal Limitations and Requirements

19. In addition to the requirements of this AO, all applicable provisions of 40 CFR 60, New Source Performance Standards (NSPS) Subpart A, 40 CFR 60.1 to 60.18 and Subpart Y, 40 CFR 60.250 to 60.254 (Standards of Performance for Coal Preparation Plants) apply to this installation. The facility must operate in accordance with the most current version of 40 CFR 60 applicable to this source.

Records & Miscellaneous

20. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures,

and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded.

21. The owner/operator shall comply with R307-150 Series. Inventories, Testing and Monitoring.
22. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the Division of Air Quality. The Utah Administrative Code R307 rules used by DAQ, the NOI guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The annual emission estimations below include point source, fugitive emissions, fugitive dust, road dust, tail pipe emissions, etc. and do not include grandfathered emissions. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for this source (the entire plant – post 1969 emission sources only) are currently calculated at the following values:

<u>Pollutant</u>	<u>Tons/yr</u>
A. PM ₁₀	2.13
B. SO ₂	0.13
C. NO _x	1.98
D. CO	0.45
E. VOC	0.04

The DAQ is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Sincerely,

Rusty Ruby, Manager
New Source Review Section